

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

Noel Andujar

**CHAPTER** 13

**CASE NO.** 5 - 19 .bk- 02089-RNO

**Debtor(s)**

First Guaranty Mortgage Corporation

**ADVERSARY NO.**     -     ap-             
(if applicable)

**Plaintiff(s)/Movant(s)**

**vs.**

Noel Andujar

**Nature of Proceeding:**                     

Motion for Relief from Stay

Charles J. DeHart, III (Trustee)

**Defendant(s)/Respondent(s)**

**Document #:** 48

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

To allow time for the parties to resolve and/or settle the pending Motion for Relief from Stay.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: June 22, 2020

/s/ Chandra M. Arkema

Attorney for Movant

Name: Chandra M. Arkema

Phone Number: 215-886-8790 Ext 28

<sup>1</sup> No alterations or interlineations of this document are permitted.